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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION VIII

999 18th STREET - SUITE 500 DENVER, COLORADO 80202-2405

JAN 1 1 1991

Ref: 8WM-DW

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William L. Brister
Division Manager
CONOCO Inc.
851 Werner Court
Casper, Wyoming 82601-1311

UNDERGROUND INJECTION CONTROL (UIC)
P & A Plan and Redrill Approval
UIC No. WYS2521-2119, Shoshone #65-77
Circle Ridge Field, Fremont County,
Wyoming

Dear Mr. Brister:

Your January 11, 1991, request for approval of the enclosed Plugging and Abandonment (P&A) Plan and the subsequent skidding of the drilling rig to redrill the recently UIC permitted subject well has been reviewed and approved.

A review of the details requiring this emergency action indicate that the drilling tools became stuck because of excessive water flows, which resulted in sloughing shales collapsing the hole around the tools below approximately 393 feet. Attempts to "wash-over" the stuck tool string resulted in the hole being "kicked-off" in new directions, with no indication that the original hole was reentered after several attempts. The proposed two-stage P&A Plan should adequately seal off the undesired water flow(s) and prevent any further problems in the existing hole.

Redrilling the well as Shoshone #65-77A under the existing UIC permit is to be accomplished using aerated drilling mud. This should preclude the breakdown of the fragile water-flow zone, and thus provide for better down-hole control at this location. It is proposed that the drilling rig be skidded on the small, existing

Mr. William L. Brister Division Manager CONOCO Inc. Page Two

It should be noted that no USDWs are present in the area, as indicated in the subject UIC permit. Therefore, no USDWs will be endangered as a result of this revised plan for P&A of the Shoshone #65-77 well and constructing the Shoshone #65-77A enhanced recovery injection well as its replacement.

Please direct any questions concerning this action to the attention of Gustav Stolz at Mail Code 8WM-DW or you may telephone him at (303) 293-1416.

Sincerely,

Water Management Division